



BENEFITS RECEIVED AT CONVENTIONS

Generally, the Ethics Code's gift and reporting provisions apply with equal effect to political and nonpolitical events and to in-state and out-of-state events. *Advisory Opinion No. 2004-12* addresses a number of hypothetical questions regarding the acceptance of meals or other benefits provided to public officials (e.g. legislators) at national legislative organizations or national political conventions. Specifically, benefits may be offered by the following sources, with the accompanying outcomes:

- Restricted donor (i.e., registered lobbyist; entity regulated by, doing business with or seeking to do business with official's agency; etc.)
 - Any benefit received must fall within one of the gift exceptions in Conn. Gen. Stat. § 1-79 (e) (1) – (17), for example, the \$50 annual limit on food and beverage.
- Non-restricted donor (e.g. out-of-state lobbyist whose employer does not have a Connecticut lobbyist):
 - If a benefit is offered by virtue of one's public position, benefit must be limited to less than \$100.
 - Note: if the recipient is at the conference because of his or her public office, the presumption is that any benefit provided is offered by virtue of his or her position.
 - If the benefit is strictly personal, e.g., an out-of-state lobbyist and legislator are longtime friends, no limit exists.
- Restricted donor listed as a sponsor of the event:
 - If the convention is *generally* sponsored or underwritten by a corporation, and its funds are not earmarked for an event with Connecticut attendees, there is a \$100 limit to the benefits a legislator or public official may receive.
 - If a corporation provides funds with the explicit understanding that the monies will be used to underwrite an event at which Connecticut officials will be in attendance, the Code's gift restrictions apply.
- National legislative organization providing travel scholarships (funded by corporate contributions) for legislators:
 - Whether or not a scholarship account is funded by lobbyist contributions, a legislator or public official may accept travel expenses and accommodations (and other "necessary expenses") for an article, appearance or speech, or for participation at an event in one's official capacity.
 - Within 30 days of receiving reimbursement of necessary expenses for lodging or out-of-state travel, you must file an ETH-NE form with the OSE.

Please direct any questions to:
Office of State Ethics ♦ 18-20 Trinity Street ♦ Hartford, CT 06106
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CHARITABLE EVENTS AT CONVENTIONS

Advisory Opinion No. 2004-10 contemplates whether public officials and state employees may accept free tickets to a charitable event held in conjunction with a convention under the charitable event gift exception. In general, for this exception to apply (i.e., for the free ticket to be permissible):

- The official or employee must be invited to participate in his/her official capacity;
- Admission must be provided by the primary sponsoring entity (e.g., the charity, as 2004-10 concluded); and
- Benefits may only include event admission and food and beverage (no travel or other tangible gifts over \$10).

Note there is nothing that would prohibit the official or employee from paying to attend the event in question.

RESTRICTIONS AND REPORTING FOR LOBBYISTS

As addressed in *Advisory Opinion No. 2000-19*, the Lobbyist Code's gift restrictions and reporting requirements apply to expenditures for food and drink or entertainment made at the two major party political conventions.

- These restrictions and reporting requirements apply whether expenditures are made in or outside of CT and whether the purpose of the event is in furtherance of or unrelated to lobbying.
- Likewise, the provisions apply whether expenditures are made directly by the CT lobbyist or indirectly by a national association or business entity "on behalf of" the CT lobbyist.
- Further, the same requirements apply to convention events underwritten by a lobbyist, if its donations to the political convention committees were made with the explicit understanding that the monies would be used to pay for an event at which CT officials would be in attendance.

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